

JAP:HDM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

WADHA ABDULJALIL ALI SALE AL
GAMRI,

Defendant.

AMENDED COMPLAINT AND
AFFIDAVIT IN SUPPORT OF
ARREST WARRANT
(T.18, U.S.C. 1546)

15-M-099

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EASTERN DISTRICT OF NEW YORK, SS:

Elizabeth Wall, being duly sworn, deposes and states that she is a Special Agent with the United States Department of State, Diplomatic Security Service, duly appointed according to law and acting as such.

On or about April 10, 2014, within the Eastern District of New York, the defendant WADHA ABDULJALIL ALI SALE AL GAMRI did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service (“DSS”). I am familiar with the facts and circumstances set forth below from my review of the investigative file.

2. In August 2014, DSS received information from the Department of Homeland Security, Office of the Inspector General (“DHS-OIG”) that DHS-OIG had received an anonymous tip that certain Yemeni national employees working in the non-immigrant visa unit of the U.S. Embassy in Sanaa, Yemen were helping other Yemeni nationals in procuring non-immigrant visas to the United States in exchange for money. The visa applications obtained in this manner contained numerous false statements – principally with respect the purpose of the visa applicants’ travel to the United States and the visa applicants’ employment.

3. On or about April 10, 2014, the defendant WADHAH ABDULJALIL ALI SALE AL GAMRI arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York, Royal Jordanian Airlines, Flight number 261, which had departed from Amman, Jordan. Upon arrival at JFK, the defendant presented a valid Yemeni passport (No.05351327). The passport contained a B1/B2 United States entry visa, Visa Foil No. F8124030, issued by the United States Department of State, Bureau of Consular Affairs, on March 12, 2014. The defendant was applying for entry as a visitor for business.

4. DSS agents were able to review the visa application for the defendant, WADHAH ABDULJALIL ALI SALE AL GAMRI which was submitted on January 19, 2014 and presented to a U.S. Consular Officer at the U.S. Embassy in Sanaa, Yemen on March 12, 2014. In his visa application, the defendant stated, among other things, that he was a “General Manager” of “Al Gamri Farm.” The defendant also stated in his visa application

that the purpose and intent of his trip to the United States was to attend the “26th Specialty Coffee Event” in Seattle, Washington for approximately two months.

5. In September 2014, DSS agents received information from the Yemeni Ministry of Commerce and Information confirming that the “Al Gamri Farm” is not a registered or legitimate company in Yemen.

6. In January 2015, DSS agents spoke to the senior registration manager of the “The 26th Specialty Coffee Event.” This individual stated that the defendant WADHA ABDULJALIL ALI SALE AL GAMRI did not register or pay for the conference. Furthermore, the defendant did not actually attend the conference. In addition, a review of law enforcement databases uncovered no evidence that the defendant ever travelled to Seattle, Washington after he arrived at JFK and that the defendant listed a Brooklyn, N.Y. address as “address while in the United States” on his 1-94 customs form and immigration form, which was not disclosed in his visa application or interview.

7. A review of State Department databases reveals that the defendant WADHA ABDULJALIL ALI SALE AL GAMRI has been a “visa overstay” since October 09, 2013.

WHEREFORE, your deponent respectfully request that the defendant
WADHA ABDULJALIL ALI SALE AL GAMRI be dealt with according to law.

S/ Elizabeth Wall

Elizabeth Wall
Special Agent
United States Department of State
Diplomatic Security Service

Sworn to me before this
5th day of May, 2015

S/ Steven Gold

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK